

# Gregory Zimmer, Esq.

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March 24, 2025

## **VIA ECF**

Honorable Valerie Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 443  
New York, New York 10007

Re: *In re Navidea Biopharmaceuticals Litigation, Case No. 19-cv-01578-VEC*

Dear Judge Caproni:

I represent Counterclaim Plaintiff, Dr. Michael M. Goldberg, M.D. (“Dr. Goldberg”) in the referenced action. I enclose herein a copy of my monthly billing records for calendar year 2024, comprising Exhibit Y to Dr. Goldberg’s attorneys’ fee application, which was inadvertently omitted from Dr. Goldberg’s earlier filing.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Gregory Zimmer, Esq.

Gregory Zimmer, Esq.  
142 New Chalet Drive  
Mohegan Lake, NY 10547  
(914) 402-5683  
[GZimmer@GZimmerLegal.com](mailto:GZimmer@GZimmerLegal.com)

cc: James G. Ruiz, Esq.  
Elin Eisenhower, Esq.

GREGORY ZIMMER, ESQ.  
 142 New Chalet Drive  
 Mohegan Lake, New York 10547

May 2, 2024

**VIA ELECTRONIC MAIL**

Michael M. Goldberg, M.D.  
 207 Booth Avenue  
 Englewood, NJ 07631  
 MGoldberg@MontaurCap.com

INVOICE NUMBER: 0017  
 MATTER NUMBER: 03 – PPVA Dispute

		<u>HOURS</u>
4/02/2024	GREGORY ZIMMER Review expert issues re damages in preparation for oral argument on motion to strike M. Goldberg expert disclosure.	1.70
4/03/2024	GREGORY ZIMMER Prepare for and participate in oral argument re motion to strike M. Goldberg expert disclosure.	2.20
4/04/2024	GREGORY ZIMMER Review expert deposition in preparation for preparing expert report of M. Goldberg; review M.Goldberg notes on PPVA expert report; t/c w/ M. Kook re M. Goldberg expert report.	2.10
4/05/2024	GREGORY ZIMMER Review PPVA expert deposition i/c/w preparation of expert report of of M. Goldberg.	1.50
4/06/2024	GREGORY ZIMMER Review PPVA expert deposition i/c/w preparation of expert report of of M. Goldberg.	1.20
4/08/2024	GREGORY ZIMMER T/c w/ M. Goldberg and M. Kook re M. Goldberg expert report.	0.50
4/10/2024	GREGORY ZIMMER Work on M. Goldberg expert report; t/c w/ M. Goldberg re same.	2.00
4/11/2024	GREGORY ZIMMER Continue drafting M. Goldberg expert report; t/c w/ M. Goldberg re expert and valuation issues.	3.50

Michael M. Goldberg, M.D.

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4/12/2024	GREGORY ZIMMER Prepare M. Goldberg expert report.	5.00
4/13/2024	GREGORY ZIMMER Prepare M. Goldberg expert report.	5.50
4/15/2024	GREGORY ZIMMER Prepare M. Goldberg expert report; t/cs w/ M. Goldberg and M. Koook re same.	4.10

Amount\$11,720.00**Courtesy Discount Applied:****-\$1,000.00****Balance Due:****\$10,720.00**

Michael M. Goldberg, M.D.

May 2, 2024

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## Timekeeper Summary

<u>Name</u>	<u>HOURS</u>	<u>Rate</u>	
GREGORY ZIMMER	29.30	400.00	<u>\$11,720.00</u>
TOTAL FEES			<u>\$11,720.00</u>

GREGORY ZIMMER, ESQ.  
 142 New Chalet Drive  
 Mohegan Lake, New York 10547

June 10, 2024

**VIA ELECTRONIC MAIL**

Michael M. Goldberg, M.D.  
 560 Sylvan Ave, Third Floor  
 Englewood Cliffs, NJ 07632  
 MGoldberg@MontaurCap.com

INVOICE NUMBER: 0050  
 MATTER NUMBER: 01 – Navidea/Macrophage Dispute

		<u>HOURS</u>
5/06/2023	GREGORY ZIMMER Review draft reply re cross-motion for reconsideration.	0.50
5/16/2024	GREGORY ZIMMER T/c w/ M. Golberg re potential settlement and terms.	1.00
5/21/2024	GREGORY ZIMMER Review <i>Daubert</i> decision i/c/w preparing settlement proposal; trial scheduling issues; corresp. w/ M. Goldberg re same; legal research re pre-judgment interest.	2.70
5/22/2024	GREGORY ZIMMER Additional issues re interest calculation; t/c w/ M. Goldberg re settlement; research discount for lack of marketability issues i/c/w <i>Daubert</i> issues; corresp. w/ M. Goldberg re same.	1.20
5/23/2024	GREGORY ZIMMER Corresp. re damages issues.	0.30
5/24/2024	GREGORY ZIMMER Draft settlement proposal to Navidea.	0.70

Michael M. Goldberg, M.D.

June 10, 2023

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5/29/2024 GREGORY ZIMMER  
Revise settlement proposal to Navidea.

0.50

Amount

\$2,760.00

**Balance Due:**

**\$2,760.00**

Michael M. Goldberg, M.D.

June 10, 2023

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## Timekeeper Summary

<u>Name</u>	<u>HOURS</u>	<u>Rate</u>	
GREGORY ZIMMER	6.90	400.00	\$2,760.00
TOTAL FEES			<u>\$2,760.00</u>

GREGORY ZIMMER, ESQ.  
 142 New Chalet Drive  
 Mohegan Lake, New York 10547

July 8, 2024

**VIA ELECTRONIC MAIL**

Michael M. Goldberg, M.D.  
 560 Sylvan Ave, Third Floor  
 Englewood Cliffs, NJ 07632  
 MGoldberg@MontaurCap.com

INVOICE NUMBER: 0051  
 MATTER NUMBER: 01 – Navidea/Macrophage Dispute

		<u>HOURS</u>
6/06/2024	GREGORY ZIMMER Review reconsideration decision; corresp. w. M. Goldberg re same.	0.50
6/07/2024	GREGORY ZIMMER T/c w/ W. Fang re reconsideration decision and next steps.	0.50
6/10/2024	GREGORY ZIMMER T/c W/ W, Fang re B. Kazan withdrawal motion.	0.20
6/11/2024	GREGORY ZIMMER T/c w/ M. Goldberg re B. Kazan withdrawal motion and implications for action going forward.	0.50
6/14/2024	GREGORY ZIMMER T/cs w/ M. Goldberg and J. Delgado re case status.	0.70
6/17/2024	GREGORY ZIMMER Participate in Court hearing re B. Kazan withdrawal motion; t/c w/ M. Goldberg re same; corresp. w/ Lowenstein team re same.	1.70
5/29/2024	GREGORY ZIMMER Revise settlement proposal to Navidea.	0.50

Amount

\$1,840.00

**Balance Due:**

**\$1,840.00**



Michael M. Goldberg, M.D.

July 8, 2023

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## Timekeeper Summary

<u>Name</u>	<u>HOURS</u>	<u>Rate</u>	
GREGORY ZIMMER	4.60	400.00	\$1,840.00
TOTAL FEES			<u>\$1,840.00</u>